



Advocates for Workplace Fairness

December 27, 2021

**Via ECF:**

The Honorable Lorna G. Schofield  
 United States District Court  
 for the Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

**Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)**

Dear Judge Schofield:

We represent Plaintiff Ulku Rowe in the above-referenced matter. Plaintiff filed a letter on December 27, requesting that the court order Defendant to comply with the page requirements set forth in her Order and re-file its Reply/Opposition Memorandum and accompanying Motion to Seal in accordance with such rule. (ECF No. 191). In response, Defendant represented that it had inadvertently failed to comply with the Order and proposed that instead, Plaintiff's page limitation be expanded to 60 pages of briefing total and that Plaintiff's deadline should be extended by one week (ECF No. 192).

Defendant's proposal would not adequately remedy the issue. The Court issued this Order in advance of the Parties' briefing for good reason: to limit excessive briefing and prevent unnecessary taxing of the Parties' and the Court's resources. Defendant's failure to comply with the Court's Order - inadvertent or not - should not prejudice Plaintiff and unduly burden the Court. As such, the only fair remedy is to Order Defendant to re-file its Reply/Opposition Memorandum and accompanying Motion to Seal in accordance with such rule. Plaintiff maintains her proposal that the Court adopt the following schedule:

Defendant's deadline to re-file Reply in Further Support of its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment (ECF No. 184).	One (1) day following the Court's Order Directing Defendant to comply with the page limitations.
--	--



Advocates for Workplace Fairness

Defendant's Deadline to re-file its Motion to Seal and Memorandum of Law. (ECF Nos. 188-189).	One (1) day following the Court's Order Directing Defendant to comply with the page limitations.
Plaintiff's Deadline to file its Reply in Further Support of her Partial Motion for Summary Judgment.	Three (3) weeks following Defendant's Reply.
Plaintiff's Opposition to Defendant's Motion to Seal.	Ten (10) days following Defendant's Motion to Seal.

We thank the Court for its consideration of this matter.

Respectfully submitted,

Cara E. Greene  
 Shira Z. Gelfand  
 Outten & Golden LLP  
 685 Third Avenue, 25<sup>th</sup> Floor  
 New York, NY 10017  
*Counsel for the Plaintiff*

cc: All Parties (via ECF)

Application **GRANTED**. By **January 5, 2022**, Defendant shall re-file its reply in support of its motion for summary judgment and any opposition to Plaintiff's motion for summary judgment in compliance with the August 9, 2021, Order setting the briefing schedule and related page limits. Defendant also shall file any revised motion to seal by **January 5, 2022**. By **January 26, 2022**, Plaintiff shall file her reply in support of her cross-motion for summary judgment.

Dated: December 28, 2021  
 New York, New York

**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**